

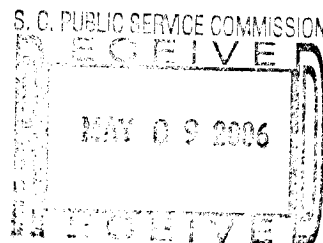
C. DUKES SCOTT
EXECUTIVE DIRECTOR

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Columbia, S.C. 29211



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DAN F. ARNETT
CHIEF OF STAFF



May 5, 2006

Scott L. Robinson, Esq.
Johnson, McKenzie & Robinson, LLC
16 North Brooks Street
Manning, SC 29102

RE: Joint Application of Timothy P. Oliver and James C. Thigpen for Approval of Transfer of Assets of Goat Island Water and Sewer Company, Inc.
Docket No. 2006-50-WS

Dear Scott:

Enclosed you will please find a data request for certain information from the Goat Island Water and Sewer Company related to the requested transfer of operating authority filed with the Public Service Commission in February.

We do not wish to delay the process of your clients meeting the compliance standards set by DHEC but do require the requested information in the event that this matter reaches a hearing before the Public Service Commission. Should your clients feel that they will meet the DHEC requirements prior to the due date of the data request or should they require an extension to provide the requested information, please contact me at your convenience.

Sincerely,



Jeffrey M. Nelson

JMN/pjm

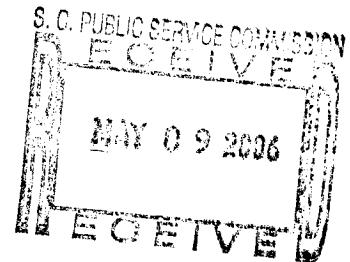
Enclosure

cc: Mr. Charles L.A. Terreni

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2006- 50 -W/S

IN RE:)
Joint Application of Timothy P. Oliver and James)
C. Thigpen for Expedited Approval of a Transfer)
of Assets of Goat Island Water and Sewer)
Company, Inc.; the Transfer of Operating Authority)
of Goat Island Water and Sewer Company, Inc.; and)
Transfer of all Sewer Service System without)
Limitations to all Current Customers of Goat Island)
Water and Sewer Company, Inc. of Clarendon)
County, South Carolina)

Office of Regulatory Staff's
First Set of Continuing Data Requests



TO: SCOTT L. ROBINSON, ESQUIRE, ATTORNEY FOR TIMOTHY P. OLIVER,
JAMES C. THIGPEN, AND GOAT ISLAND WATER AND SEWER COMPANY,
INCORPORATED

INSTRUCTIONS

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175 and to 26 S.C. Code Regs. 103-853 (Supp. 2005), the Office of Regulatory Staff hereby serves its First Set of Continuing Data Requests upon the Goat Island Water and Sewer Company, Incorporated ("Goat Island" or "the Company") and the Applicants James C. Thigpen and Timothy P. Oliver (together herein referred to as "the Applicants"). The Office of Regulatory Staff hereby requests that you answer the following data requests in writing and under oath and serve the undersigned within ten (10) days after service of this Data Request at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or

part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, title, and current address and telephone number of the person. When asked to identify or provide a document, "identify" and "provide" means to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings. As used in this data request, "address" means mailing address and business address.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- A. That all information shall be provided to the undersigned in the format as requested.
- B. That all responses to the requests below be labeled using the same numbers as used herein.
- C. That each of the enumerated data requests be reproduced at the beginning of each of the responses.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the data request in the appropriate sequence.

- E. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.
- F. That all exhibits be reduced to 8 ½" x 11" format, where practical.
- G. That the requested information be bound in ring binders (loose leaf notebooks) or otherwise suitably bound.
- H. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each response be indicated.
- I. That the Company provide to the Office of Regulatory Staff two copies of the responses to this data request as soon as possible but no later than ten (10) days after service thereof.
- J. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- K. This data request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.

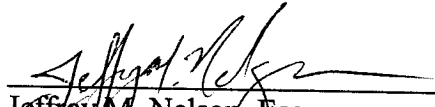
QUESTIONS

- 1.1 Provide a copy of the completed *Application for Transfer of Operating Permit for a Public Water System* as required by the South Carolina Department of Health and Environmental Control (DHEC).
- 1.2 Provide a copy of the document(s) submitted to DHEC that demonstrates that the water system will be managed to ensure its long-term viability. Include a copy of the business plan.
- 1.3 Identify the appropriately licensed certified distribution system operator and treatment system operator assigned to manage the water system. Please note that DHEC has identified the Goat Island's water system as requiring a Grade C treatment operator and a Grade D distribution system operator.
- 1.4 Has well #2, as identified in the March 24, 2005 sanitary survey by DHEC, been put back on line? If not, what is the schedule for placing the well back on line?

- 1.5 Have all of the deficiencies that were noted in the previous sanitary survey by DHEC been properly addressed? If they have been addressed, please provide any written documentation identifying the resolution. If not, provide a schedule for compliance.
- 1.6 List all real estate and land rights owned by Goat Island Water and Sewer Company, Inc. If applicable, state the date of the purchases or acquisitions, the purchase price, and the location of the real estate and the physical areas to which any land rights apply.
- 1.7 Provide the most current DHEC Drinking Water Sanitary Survey for the drinking water system.
- 1.8 Provide the most current DHEC Wastewater Treatment Facility Operation and Maintenance Evaluation Report for the wastewater system.
- 1.9 Provide a copy of the complete customer complaint log detailing all recorded customer service and billing complaints for the drinking water and sewer systems for the period from January 1, 2005 through April 1, 2006.
- 1.10 Provide a copy of the Contract or Agreement between Timothy P. Oliver and James C. Thigpen regarding the transfer of assets and/or operating authority for the Goat Island Water and Sewer Company, Incorporated.
 - a. State the effect of such agreement or contract for the sale of assets and operating authority on the payment or transfer of any loans, loan agreements, mortgages or other debts or financial obligations of Goat Island Water and Sewer Company, Incorporated or James C. Thigpen on behalf of or doing business as Goat Island Water and Sewer Company.
 - b. If such loans or loan agreements exist state whether Mr. Oliver or the Goat Island Water and Sewer Company will be obligated and responsible for such loans after the transfer in ownership of Goat Island Water and Sewer Company, in what amount(s), and identify the lender or note holder for such loans.
- 1.11 Identify if the offices of Goat Island Water and Sewer Company will remain in their present location or if such offices will be moved after the proposed transfer in ownership. If the offices will be moved to a new physical location, provide the physical address where such offices will be moved.
- 1.12 Does this transfer include the assets and equipment serving the Haynesworth subdivision in Clarendon County? If so, provide the PSC docket and order number under which water service expanded to the Haynesworth subdivision. If not, provide the schedule for filing an application with the PSC to establish the

water system or to expand the service area of Goat Island Water and Sewer Company to include the Haynesworth Subdivision.

May 5, 2006



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